

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CENTURY INDEMNITY COMPANY (as
Successor to CCI INSURANCE COMPANY, as
successor to INSURANCE COMPANY OF
NORTH AMERICA), INSURANCE COMPANY
OF NORTH AMERICA,

Plaintiffs,

- v. -

CATERPILLAR INC., CATERPILLAR
INSURANCE COMPANY LTD.

Defendants.

Case No. 1:15-cv-04542

**PLAINTFFS' MOTION FOR LEAVE TO FILE DECLARATION OF VINCENT S.
WEISBAND UNDER SEAL**

Plaintiffs Century Indemnity Company, as successor to CCI Insurance Company, as
successor to Insurance Company of North America, and Insurance Company of North America
(collectively, "Century") move for leave of Court to file under seal the Declaration of Vincent S.
Weisband. Century makes this motion out of an abundance of caution because Caterpillar
alleges that communications cited therein are privileged under Illinois law.

To be clear, but for Caterpillar's tendentious claim of privilege, Century would not
pursue leave to file under seal. Century does not contend the documents are privileged.

Dated: January 7, 2015
Chicago, Illinois

Respectfully submitted,

By: /s/ Vincent S. Weisband

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Company, as successor to Insurance

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CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2016, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF and served it by CM/ECF on the following counsel of record.

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Dated: New York, New York
January 7, 2016

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